

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
IONICS INCORPORATED,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 04-11943-PBS
	)	
GLOBAL ENERGY, INC.,	)	
	)	
Defendant.	)	
_____	)	

**STIPULATION TO EXTEND TIME FOR DEFENDANT TO RESPOND TO  
PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

The parties, by and through their counsel, hereby stipulate to extend the time for Defendant to respond to Plaintiff's pending motion for summary judgment, by one week, until November 11, 2004. The parties are close to reaching a settlement of this matter and would like not to devote unnecessary resources to the pending motion. Extending the time for a response to the motion will conserve resources and will help to effectuate settlement. The extension will not disrupt the orderly disposition of this case.

Respectfully submitted,

Respectfully submitted,

/s/ Kim M. Clarke

David B. Mack (BBO #631108)  
Kim M. Clarke (BBO #657711)  
Nixon Peabody LLP  
100 Summer Street  
Boston, MA 02110  
Tel: (617) 345-1000

*Counsel for Ionics Incorporated*

Dated: November 4, 2004

/s/ Jason W. Morgan

Jason W. Morgan (BBO #633802)  
Drohan, Hughes, Hoffman & Tocchio, P.C.  
175 Derby Street, Suite 30  
Hingham, MA 02043  
Tel.: (781) 749-7200

*Counsel for Global Energy, Inc.*